

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TENNESSEE  
MEMPHIS DIVISION

In Re:

Case No. 15-32272

MICHELLE GOSS JONES AKA MICHELLE G. Chapter 13  
JONES AKA MICHELE GOSS,

DEBTOR(S).

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**RESPONSE TO OBJECTION TO CLAIM OF NATIONSTAR MORTGAGE LLC, CLAIM NO. 24  
BY NATIONSTAR MORTGAGE LLC REGARDING REAL PROPERTY LOCATED AT 7670  
STONE MANOR ROAD, MEMPHIS, TENNESSEE 38125**

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**COMES NOW**, Nationstar Mortgage LLC, by and through the undersigned Counsel, and hereby objects to the Debtor's Objection to Claim of Nationstar Mortgage, LLC Claim No. 24. The objection is supported as follows:

1. The Debtor, Michelle Goss Jones aka Michelle G. Jones aka Michele Goss, filed her Chapter 13 bankruptcy on December 31, 2015, in the Western District of Tennessee, Memphis Division.
2. Nationstar Mortgage LLC is a secured creditor, holding a perfected security interest in the property located at 7670 Stone Manor Road, Memphis, TN 38125.
3. On March 10, 2016, the Debtor filed a Notice of Filing of Loan Modification Proposal (Or Agreement). The Debtor attached an approval letter to the notice, stating the Debtor was approved to enter into a Trial Period Plan.
4. Under the Trial Period Plan, the Debtor had to make three payments of \$823.02 from April 2016 through June 2016 as a condition to the loan being reviewed for permanent modification.

5. The Debtor has not paid the June 2016 payment as required under the Trial Period Plan.
6. The loan has not been permanently modified, and the Debtor's objection should be denied.

**WHEREFORE**, Nationstar Mortgage LLC prays:

1. That Nationstar Mortgage LLC be allowed an opportunity to be heard on the matter.
2. That the Debtor's objection be denied.
3. That Nationstar Mortgage LLC be awarded its attorney fees and costs incurred in this action.
4. That the Court grant any and all further relief to which Nationstar Mortgage LLC may be entitled.

Respectfully submitted,

/s/ Kyle Stewart  
Kyle Stewart  
TN State Bar No.: 033796  
SHAPIRO & INGLE, L.L.P.  
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Charlotte, NC 28216  
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Phone: (704) 333-8107  
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**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and exact copy of the Creditor's Response to the Debtor's Objection to Claim has been electronically served or mailed, postage prepaid on June 22, 2016 to the following:

B. David Sweeney  
P.O. Box 341698  
Bartlett, TN 38184

Michelle Goss Jones aka Michelle G. Jones aka Michele Goss  
7670 Stone Manor Rd.  
Memphis, TN 38125

George W Stevenson  
5350 Poplar Avenue  
Suite 500  
Memphis, TN 38119-3697

/s/ Kyle Stewart  
Kyle Stewart (033796)